



**MacDermid**  
INCORPORATED

RCRA RECORDS CENTER  
FACILITY MAC DERMID  
I.D. NO. CTD001164599  
FILE LOC. R-1B  
OTHER RDMS #100882

*Handwritten initials and "R-1B"*

245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900



RDMS DocID 00100882

June 28, 1989

**RECEIVED**  
**JUL 25 89**  
ME & VT WASTE  
MANAGEMENT BRANCH

US EPA  
Waste Management Division  
HER/ CAN 6  
JFK Federal Building  
Boston, MA 02203

Attention: Ms. Susan Green

Subject: Soft Hammer Demonstration/Certification

Madam:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, MacDermid, Inc. had enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a) (2) for EPA waste Code U226.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

Fuels Blending is the best practically available treatment.  
(See attached demonstration for further details).

If any further information is required, please contact me at 203-575-7947.

Sincerely,

Cherrie D. Gillis  
Compliance Administrator

EPA ID: CTD001164599

JUL - 6 1989

## SOFT HANGER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
1. Safety-Kleen	Dolton, IL or Newcastle, KY or Linden, NJ	Fuel Blending	SEE ATTACHED ACCEPTANCE SHEET FROM SAFETY KLEEN		6/29/89	D Attachment 4

2.

3.

\*For no available treatment: insert  
number key from Attachment 3.

For available treatment: insert  
the letter key from Attachment 4.

## ATTACHMENT 3

FIRST THIRD "SOFT-HAMMER" DEMONSTRATION  
No Available Practical Alternative to Land Disposal

## Explanation Of Why No Treatment Is Practically Available

I have not been able to locate practically available treatment or recovery for the waste described in the cover letter because, (refer to checked items, and any additional comments):

- (1) \_\_\_\_\_ No recovery facilities have been located which will be able to recover the hazardous constituents of this waste.
- (2) \_\_\_\_\_ There is no safe and legal treatment or recovery operation which I can perform practically at my site that will appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
- (3) \_\_\_\_\_ I have not been treating this waste at my site in the past, using a treatment technology which has been found to appreciably reduce the toxicity or mobility or mobility of the hazardous constituents of the waste.
- (4) \_\_\_\_\_ Stabilization treatment will not appreciably reduce the toxicity or mobility of the hazardous constituents of this waste.
- (5) \_\_\_\_\_ Incineration, thermal oxidation or other destruction technologies will not appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
- (6) \_\_\_\_\_ I have examined the possibilities of recovery/recycling, incineration, other destruction technologies, and stabilization, in that order or preference, I have not been able to locate any such treatment facilities that will accept this waste.
- (7) \_\_\_\_\_ The cost of treatment, shipment and disposal at the treatment/recovery facilities that have been located is greater than or equal to twice the cost of shipment and disposal at the RCRA landfill.

## Additional Comments:

- (8) \_\_\_\_\_

#### ATTACHMENT 4

#### FIRST THIRD "SOFT-HAMMER DEMONSTRATION

Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

- A Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.
- B Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.
- C Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.
- D A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.
- E Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.
- F Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.
- G Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies and found that they were not practically available for the following reason(s):
- H Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

- I the low percentage of hazardous organic constituents presents,
- J the low heating value of the waste,
- K the high percentage of inorganic constituents present,
- L the lack of located available capacity of incineration or fuels blending facilities

This waste is not suitable for recovery due to:

- M The hazardous constituents are present in concentrations that make recovery technologically impossible.
- N The hazardous constituents are present in concentrations that make recovery economically infeasible.
- O No recovery facilities were located that could treat this type of waste.
- P No recovery facilities were located that had capacity to treat this type of waste.
- Q The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

Additional Comments:



*accepted*

*#359*

80764 - R2304  
FUELS  
CONTROL #: 036010

CUSTOMER COPY

PRE/SHIP ANALYSIS - COMPLETE  
CUSTOMER SURVEY  
\* \* E N V I R O S Y S T E M S \* \*

05/16/89 PAGE 1 OF 2  
REVISED DATE 05/16/89  
SAMPLE #: 041325

BILLING ADDRESS:

MACDERMID, INC  
526 HUNTINGDON AVE  
WATERBURY

CT 06708

50 BROOKSIDE RD  
WATERBURY

CT 06708

FEDERAL EPA ID: CTDOO1164599 COUNTY:  
STATE EPA: IL: MO. ID:  
MANIFEST ADDRESS IS MANIFEST TO

NATURE OF BUSINESS: SPECIALTY CHEMICAL MFG.  
ID: SIC #: 2899

MATERIAL DESCRIPTION:		MATERIAL COMPOSITION (VOL%):			
METHYLE ETHYL KETONE, CONTAMINATED		MIN	MAX	TYPICAL	
PROCESS DESCRIPTION:					
MANF. & CUSTOMER USAGE					
VOLUME	: 275 GALS PER ONE TIME ONLY				
VOLUME ON HAND	: 275				
STORAGE CAPACITY	: 55 IN DRUMS				
SHIPPING FREQUENCY	: IN DRUMS				
COLOR	: RED				
LAYERS	: ONE				
PHYSICAL STATE	: LIQUID				
VISCOSITY	: MEDIUM				
		COBALT METALIZED			
		AZO DYE FAMILY			1.0
		WATER			
		NON-VOLATILE MATERIAL			
		SETTLED SOLIDS			

*U159*

RESTRICTED SUBSTANCES: NONE

D.O.T HAZARDOUS MATERIAL DESCRIPTION:

PROPER SHIPPING NAME:  
WASTE METHYL ETHYL KETONE, MIXTURE

HAZARD CLASS: FLAMMABLE LIQUID HAZARD NO. : UN1193

EPA HAZARDOUS WASTE DESCRIPTION:

NO(S): U226  
CODES:

P.O. NO: 1151-111-63403 TYPE OF SAMPLE: COMPOSITE #DRUMS: 5 TAKEN BY: CUSTOMER  
CONTACT: CHERRIE D. GILLIS TITLE: COMPLIANCE ADM PHONE: 203/575-7947  
SALESPERSON: VWR BUFFALO, NY TERRITORY: 3310 DATE: 04/03/89

ANALYST: LM REVIEWER: LM ANALYZED: 05/12/89

CORPORATE REVIEWS:	DISPOSITION	REVIEWER	DATE	APPROVED FACILITIES	AUTH#
TECHNICAL:	ACCEPT	EJE	05/12/89	654 SK DOLTON, IL	000161
REGULATORY:	ACCEPT	JWH	05/12/89	658 SK NEWCASTLE, KY	
OPERATING:	ACCEPT	LWG	05/12/89	635 LINDEN, NJ	

SK D.O.T. #: 0001003	DRUMS OR BULK	0001037	DRUM OR BULK
RQ WASTE FLAMMABLE LIQUID N.O.S.		RQ WASTE FLAMMABLE LIQUID N.O.S.	
UN1993 (EPA FO05)	1003	UN1993 (EPA FO02)	1037

COMMENT: OK FOR FUEL. SURVEY DOT/EPA DESCRIPTION IS INCORRECT. PRICING CODE: FP

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE  
HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

Dear Sir:

This letter is in response to "Soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (1) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

#### Demonstration

My organization has contracted with North East Solvents Reclamation Corp. to manage our waste and maintain documentation that the listed waste is treated/disposed by these methods. North East Solvents Reclamation Corp. has contracted the following facilities on our behalf:

1. Rollins Environmental Services, Inc.  
Route 322  
West Bridgeport, NJ 08014

2. Ensco, Inc.  
American Oil Road  
El Dorado, AR 71730

(609)467-3100  
Contact: Jim McKee  
Contact Date: 6/8/89

(501)863-7173  
Contact: Joe Rice  
Contact Date: 8/17/89

#### Waste Description

Under no circumstances may a waste be disposed of in excess of the California listed treatment standards.

<u>DOT</u> <u>Shipping Name</u>	<u>Hazard</u> <u>Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/</u> <u>Generation</u>	<u>California</u> <u>Listed Y or N</u>
Waste Flammable Liquid, nxs	Flammable Liquid	UN1993	U161	Used MIBK	No

RECEIVED  
SEP 1 89

ME & VT WASTE  
MANAGEMENT BOARD

#### Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Chen J. Guba  
Authorized Signature

Compliance Admin  
Title

8/24/89  
Date

Company Name Mac Dermid, Inc.  
Address 526 Huntington  
Waterbury, CT 06708  
EPA# CTD 001164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on  
8/17/89.

U.S. Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203

RECEIVED

SEPT 15 89

Dear Sir:

This letter is in response to "soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (2) for the "1st third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

Demonstration

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- |   |  |
|---|--|
| 1. Rollins Environmental Services Inc.<br>Route 322<br>West Bridgeport, NJ 08014<br><br>(609) 467-3100<br>Contact: Bill Bailey<br>Contact Date: 9/23/88 | 2. Marine Shale Processors, Inc.<br>Highway 90, East<br>Morgan City, LA 70380<br><br>(504) 631-3626<br>Contact: Brian Recatto<br>Contact Date: 9/23/88 |
|---|--|

Waste Description

<u>DOT Shipping Name</u>	<u>Hazard Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description</u>
Waste Flammable liquid, Nos	Flammable liquid	UN1993	U161	Methyl isobutyl ketone

Certification

I certify under penalty of law that the requirement of 40 CFR 268.8 (a) (2) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Cherrie D. Lulis Compliance Admin 9/12/89  
Authorized Signature Title Date

Company Name: MacDermid Inc.  
Address: 526 Huntington  
Waterbury, Ct. 06705

cc: North East Solvents Reclamation Corp.  
Attn: Technical Service

Regional Administrator  
US Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203

met Norman  
HAN-CAN-2

Dear Sir:

This letter is in response to "soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (2) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

RECEIVED

JUN 26 89

Demonstration

My organization has contracted with North East Solvents Reclamation Corp. to manage our waste and maintain documentation that the listed waste is treated/disposed by these methods. North East Solvents Reclamation Corp. has contacted the following facilities on our behalf:

1. Rollins Environmental Services Inc. 2. ~~Marine Shale Processors, Inc.~~  
Route 322 Highway 90, East  
West Bridgeport, NJ 08014 Morgan City, LA 70380  
(609) 467-3100 (504) 631-3626  
Contact: Jim McKee Contact: Jack Mount  
Contact Date: 6/8/89 Contact Date: 6/7/89

Signature  
c. Lee 6/19/89

Waste Description

#DOT Shipping Name	Hazard Class	UN/NA	EPA#	Description
RQ, waste, Ethylene-Glycol monoetheracetate	Combustible Liquid	UN1172	U239	photo Resists

Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (2) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

nr

Cherrie Gillis Constance Alm 6/20/89  
Authorized Signature Title Date

MACDERMID INC.  
Attn: CHERRIE GILLIS  
526 HUNTINGTON AVE.  
WATERBURY CT 06708

34 cc: North East Solvents Reclamation Corp.,  
Attn: Technical Service

M2/2308

34348



Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

AUG 30 1989

Dear Sir:

This letter is in response to "Soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (1) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

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1. Rollins Environmental Services, Inc.  
Route 322  
West Bridgeport, NJ 08014

(609)467-3100  
Contact: Jim McKee  
Contact Date: 6/8/89

2. Ensco, Inc.  
American Oil Road  
El Dorado, AR 71730

(501)863-7173  
Contact: Joe Rice  
Contact Date: 8/17/89

#### Waste Description

Under no circumstances may a waste be disposed of in excess of the California listed treatment standards.

<u>DOT</u> <u>Shipping Name</u>	<u>Hazard</u> <u>Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/</u> <u>Generation</u>	<u>California</u> <u>Listed Y or N</u>
Waste Chlorobenzon Mix	Flammable	UN1134	U037/U227		No
Waste Butyl Acetate Mix	Flammable	UN1123	U154	BR 22	No
Waste Methyl Alcohol Mix	"	UN1230	U154	RTL Alpha(260)	No
Hazardous Waste Solid NUS	ORM-E	NA9189	U188	Phenolic Resins	No

#### Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Chern S. Tschis  
Authorized Signature

Compliance Admin  
Title

8/25/89  
Date

Company Name McDermid Inc  
Address 526 Huntington Ave  
Waterbury, CT  
EPA# CTD001164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on  
10/12/88.

Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

Dear Sir:

This letter is in response to "Soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (1) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

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1. Rollins Environmental Services, Inc.  
Route 322  
West Bridgeport, NJ 08014

(609)467-3100  
Contact: Jim McKee  
Contact Date: 6/8/89

2. Ensco, Inc.  
American Oil Road  
El Dorado, AR 71730

(501)863-7173  
Contact: Joe Rice  
Contact Date: 8/17/89

#### Waste Description

Under no circumstances may a waste be disposed of in excess of the California listed treatment standards.

<u>DOT</u> <u>Shipping Name</u>	<u>Hazard</u> <u>Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/</u> <u>Generation</u>	<u>California</u> <u>Listed Y or N</u>
Waste Toluene	Flammable Liquid	UN1294	U220	Virgin Toluene	No

#### Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Cheri J. Sechin Compliance Admin 8/25/89  
Authorized Signature Title Date

Company Name MacDermid  
Address 526 Huntington Ave  
Woburn, CT  
EPA# CTD001164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on  
7-12-89.

Regional Administrator  
US Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203

Dear Sir:

This letter is in response to "soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (2) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

Demonstration

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- |  |  |
|--|--|
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|--|--|

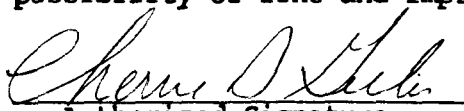

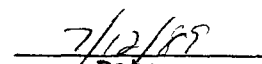
*Not to be used  
per MacDermid  
7/13/89*

Waste Description

<u>#DOT Shipping Name</u>	<u>Hazard Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description</u>
Waste Toluene	Flammable liquid	UN 1294	1220	Virgin Toluene

Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (2) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

		
Authorized Signature	Title	Date

Company Name: MacDermid, Inc.  
Address: 526 Huntington Ave.  
Waterbury, Ct. 06705

cc: North East Solvents Reclamation Corp.,  
Attn: Technical Service

Regional Administrator  
US Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203

SOLVENT/  
OCT 20 1988  
HOC

RECEIVED

Dear Sir:

This letter is in response to "soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (2) for the "1st third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

Demonstration

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- |   |   |
|---|---|
| 1. Rollins Environmental Services Inc.<br>Route 322<br>West Bridgeport, NJ 08014<br>(609) 467-3100<br>Contact: Bill Bailey<br>Contact Date: 9/23/88 | 2. Marine Shale Processors, Inc<br>Highway 90, East<br>Morgan City, LA 70380<br>(504) 631-3626<br>Contact: Brian Recatto<br>Contact Date: 9/23/88 |
|---|---|

Waste Description

WASTE TREATMENT DEMONSTRATION

<u>DOT Shipping Name</u>	<u>Hazard Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description</u>
Waste Chlorobenzene Mixture	Flammable Liquid	UN1134	U037	
Waste Butyl Acetate Mixture	Flammable Liquid	UN1123	U227 HOC U154 SOL	BR-22
Waste Methyl Alcohol Mixture	Flammable Liquid	UN1230	U154	RTZ Alpha (#266)
Hazardous Waste Solid, NOS	ORM-E	NA9189	U188	Phenolic Resins

Certification

I certify under penalty of law that the requirement of 40 CFR 268.8 (a) (2) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles J. Tuck  
Authorized Signature

Compliance Admin  
Title

10/12/88  
Date

Company Name: MacDermid Inc  
Address: 526 Huntington Ave.  
Waterbury, CT 06708

cc: North East Solvents Reclamation Corp.  
Attn: Technical Service

Regional Administrator  
US Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203

Dear Sir:

This letter is in response to "soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (2) for the "1st third" waste codes. The waste listed below is **inorganic** in nature, so thermal oxidation would not be an effective treatment due to high ash generation. I believe the greatest environmental benefit would be provided by **waste water treatment/ residue stabilization**.

Demonstration

My organization has contracted with **North East Solvents Reclamation Corp.** to manage our waste and maintain documentation that the listed waste is treated/disposed by these methods. North East Solvents Reclamation Corp. has contacted the following facilities on our behalf:

- |  |  |
|--|--|
| 1. GSX Services of Ohio<br>7415 Bessemer Ave.<br>Cleveland, Ohio 44113<br><br>(216) 441-5628<br>Contact: Jim Hatler<br>Contact Date: 9/23/88 | 2. Heritage Environmental Services Inc<br>7901 W. Morris St.<br>Indianapolis, IN 46231<br><br>(317) 243-0811<br>Contact: Steve Pettit<br>Contact Date: 9/23/88 |
|--|--|

Waste Description

<u>DOT Shipping Name</u>	<u>Hazard Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description</u>
Hazardous Waste Solid, nps	ORM-E	NA9189	U219	Metex Acid Immersion Tin

Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (2) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles J. Lela  
Authorized Signature

Compliance Admin.  
Title

10/12/88  
Date

Company Name: MacDermid Inc.  
Address: 526 Huntington Ave.  
Waterbury, CT 06708

cc: North East Solvents Reclamation Corp.,  
Attn: Technical Service

Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

68 70 100

Dear Sir:

This letter is in response to "Soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (1) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

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West Bridgeport, NJ 08014

2. Ensco, Inc.  
American Oil Road  
El Dorado, AR 71730

(609)467-3100  
Contact: Jim McKee  
Contact Date: 6/8/89

(501)863-7173  
Contact: Joe Rice  
Contact Date: 8/17/89

#### Waste Description

Under no circumstances may a waste be disposed of in excess of the California listed treatment standards.

<u>DOT Shipping Name</u>	<u>Hazard Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/ Generation</u>	<u>California Listed Y or N</u>
Waste Xylene	Flammable liquid	UN 1307	U239	Xylene colorless	No

#### Certification

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Chene D. Gels

Authorized Signature

Compl. Adm

Title

9-25-89

Date

Company Name MacDermid, Inc  
Address 526 Huntington Ave  
Waterbury, CT 06705  
EPA# CTD001164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on

n/a

Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

OCT 24 89

Dear Sir:

This letter is in response to "Soft Hammer" demonstration and certification requirements per 40 CFR 268.8 (a) (1) for the "1st & 2nd third" waste codes. The waste listed below is organic in nature and the hazardous constituents can be destroyed by thermal oxidation. I believe the greatest environmental benefit would be provided by thermal oxidation/incineration of these materials.

#### Demonstration

My organization has contracted with North East Solvents Reclamation Corp. to manage our waste and maintain documentation that the listed waste is treated/disposed by these methods. North East Solvents Reclamation Corp. has contracted the following facilities on our behalf:

1. Rollins Environmental Services, Inc.  
Route 322  
West Bridgeport, NJ 08014  
  
(609)467-3100  
Contact: Jim McKee  
Contact Date: 6/8/89

2. Ensco, Inc.  
American Oil Road  
El Dorado, AR 71730  
  
(501)863-7173  
Contact: Joe Rice  
Contact Date: 8/17/89

#### Waste Description

Under no circumstances may a waste be disposed of in excess of the California listed treatment standards.

<u>DOT</u> <u>Shipping Name</u>	<u>Hazard</u> <u>Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/</u> <u>Generation</u>	<u>California</u> <u>Listed Y or N</u>
Waste Methyl Alcohol Mixture	Flammable Liquid	UN1230	U154	Tin 417	No (470)

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Cherni O. Suleis      Comp. Adm      10/17/89  
Authorized Signature      Title      Date

Company Name Mac Dermid Inc  
Address 526 Huntington Ave  
Waterbury, CT 06708  
EPA# CTD 001164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on \_\_\_\_\_.

Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

DEC 19 89

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|--|---|
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Waste Corrosive liquid nos (Toluene Sulfone Acid)	Corr Mat'l	UN1760	DOU/ U188	stripper	N	(477)
Waste Flammable liquid nos (MEK)	Flammable liquid	UN1993	U159	Quatren(R) 5010 Resin	N	(502)

Certification

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Chen S. Heels      Comptroller      12/11/89  
Authorized Signature      Title      Date

Company Name MacDermid, Inc      cc: North East Solvents  
Address 526 Huntington Ave      Attn: Technical Service  
Waterbury, CT  
EPA# CTD001164599

This Certification/Demonstration replaces the previous form submitted on \_\_\_\_\_.



Regional Administrator  
US Environmental Protection Agency  
Region 1  
JFK Federal Building  
Boston, MA 02203

JAN 04 90

Dear Sir:

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<u>DOT</u> <u>Shipping Name</u>	<u>Hazard</u> <u>Class</u>	<u>UN/NA</u>	<u>EPA#</u>	<u>Description/</u> <u>Generation</u>	<u>California</u> <u>Listed Y or N</u>
Waste Orthodichloro- benzene, liquid	ORM-A	UN1591	U070	Orthodichloro- benzene	N #484

#### Certification

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Chern S. Seals  
Authorized Signature

Compliance Officer Title  
12-28-89 Date

Company Name MacDermid, Inc.  
Address 526 Huntington Ave  
Waterbury, CT 06708  
EPA# CTD 00164599

cc: North East Solvents  
Attn: Technical Service

This Certification/Demonstration replaces the previous form submitted on \_\_\_\_\_.